

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO**

IN RE

MARIA ELENA TORRES REYES
DEBTOR

* CASE NO. 16-04974 ESL
* CHAPTER 13
*

DEBTOR'S MOTION IN COMPLIANCE WITH ORDER, DOCKET NO. 30

TO THE HONORABLE COURT:

NOW COMES, MARIA ELENA TORRES REYES, the Debtor, through the undersigned attorney, and very respectfully state and prays as follow:

1. On February 22, 2021, this Honorable Court entered an *ORDER*, Docket No. 30, whereby the Debtor is ordered as follows:

“Debtor’s informative motion regarding Trustee’s request for entry of order (Docket Entry #29) is hereby granted. However, the Debtor shall supplement the informative motion within fourteen (14) days disclosing if any tax refund was received for the years in question, and, if so, if payment was made to the Chapter 13 Trustee in accordance with the terms of the confirmed chapter 13 plan.” *ORDER*, Docket No. 30.

2. That pursuant to the *Trustee’s Request Entry of Order*, Docket No. 28, the Chapter 13 Trustee stated that “no tax refunds have been received for year (s) 2016, 2017 & 2019”, requesting the Court “...ORDER Debtor to tender to the Trustee ... the tax refund (sic) received as per the terms of the Confirmed plan”. *See: Trustee’s Request Entry of Order*, at page 1, paragraph 2, and page 2, Docket No. 28.

3. That on February 02, 2021, the Debtor filed an informative motion (Docket No. 29) stating that on February 02, 2021, the Debtor had sent to the Chapter 13 Trustee (uploaded to the Trustee’s system) copies of the Debtor’s tax returns for the years 2016, 2017 and 2019.

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4. However, due to an inadvertent omission, the Debtor failed to address the "tax refund" issue in the aforementioned informative motion, Docket No. 29.

5. The Debtor hereby respectfully states that the Debtor did not receive a tax refund for the years 2016, 2017 and 2019. The copies of the 2016, 2017 and 2019 tax returns filed by the Debtor with the Treasury Department of Puerto Rico and submitted to the Trustee reflect that the Debtor owes \$0.00 in taxes and/or is not entitled to a tax refund(s).

6. Furthermore, the Debtor respectfully states that the Debtor is up-to-date in the confirmed Plan payments to the Chapter 13 Trustee, in the above captioned case.

7. Based on the above stated, the Debtor respectfully requests that this Honorable Court be informed of the foregoing and grant the present motion in compliance with this Court's *ORDER*, Docket No. 30, in the above captioned case.

WHEREFORE, the Debtor, through the undersigned attorney respectfully requests that this Honorable Court be informed of the abovementioned and grant the foregoing motion in compliance with this Court's *ORDER*, Docket No. 30, in the above captioned case.

I CERTIFY that on this same date a copy of this motion was filed with the Clerk of the Court using the CM/ECF filing system which will send notice of same to the CM/ECF participants, including the Chapter 13 Trustee; I also certify that a copy of this motion was sent via US Mail to Debtor, Maria Elena Torres Reyes, 20 Jose Grillo St Caguas PR 00725.

RESPECTFULLY SUBMITTED. In San Juan, Puerto Rico, this 23rd day of February, 2021.

/s/ Roberto Figueroa Carrasquillo
USDC #203614
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